

PCC



April 5, 2007

Ms. Pamela C. Creedon  
Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Dear Ms. Creedon:

NPDES NO. CA0079154

The State Water Contractors (“State Contractors”)<sup>1</sup> submit these comments regarding the Tentative Waste Discharge Requirements and Time Schedule Order for the City of Tracy Wastewater Treatment Plant Order No. R5-2007 (Tentative WDR). Water diverted from the Bay-Delta for the State Water Project is a major supply source for SWC member agencies, and source water protection is essential to providing water for urban uses that is safe to drink. The discharges to the San Joaquin River from the Tracy Wastewater Treatment Plant (Tracy) in close proximity to the export pumps, means that there is direct link between the quality of the wastewater effluent and the quality of exported drinking water supplies, as well as the potential to exceed the State Board-adopted salinity objectives in the South Delta.

In June 2006, the SWC provided comments on Order No. R5-2006 and we are encouraged that some of the issues we raised have been addressed in the revised Tentative Order. In particular, we support salinity control options 2 and 3, which will help ensure that salinity objectives for the South Delta are met. We would also like to echo the comments that one of our member agencies, Metropolitan Water District of Southern California (MWD), is making that support the inclusion of effluent monitoring requirement for total organic carbon (TOC) and phosphorus as well as the special provisions for reopening the permit upon adoption of drinking water objectives for TOC, nutrients, salinity and/or pathogens. We also share MWD’s concern with the apparent incorrect specification of interim maximum daily effluent limitations for ammonia that exceed the historical mean plus 3.3 standard deviations and request that staff update the limitation as suggested by MWD.

**DIRECTORS**

**Ray Stokes, President**  
Central Coast Water Authority

**Dan Masnada**  
Castaic Lake Water Agency

**Thomas R. Hurlbutt**  
Tulare Lake Basin Water Storage District

**Stephen N. Arakawa**  
Metropolitan Water District of Southern California

**Thomas N. Clark**  
Kern County Water Agency

**Russell E. Fuller**  
Antelope Valley-East Kern Water Agency

**David B. Okita**  
Solano County Water Agency

**Steven Robbins**  
Coachella Valley Water District

**Vince Wong**  
Alameda County FC & WCD Zone 7

**General Manager**  
Terry L. Erlewine

<sup>1</sup> The State Water Contractors organization is comprised of twenty-seven of the twenty-nine public entities that hold contracts with the State of California for the delivery of water from the State Water Project (“SWP”). Collectively, the members of the State Water Contractors provide all, or a part, of the water supply delivered to approximately 23 million Californians, roughly two-thirds of the State’s population. The State Contractors provide this water to retailers, who, in turn, serve it to consumers throughout the San Francisco Bay Area, the San Joaquin Valley, the Central Coast, and Southern California.

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We appreciate your consideration of our comments. If you have any questions, please feel free to contact me at (916) 447-7357.

Sincerely,

A handwritten signature in black ink, appearing to read 'Terry L. Erlewine', with a horizontal line extending from the top left of the first letter.

Terry L. Erlewine  
General Manager